

COOLEY LLP  
BOBBY GHAJAR (198719)  
(bghajar@cooley.com)  
TERESA MICHAUD (296329)  
(tmichaud@cooley.com)  
COLETTE GHAZARIAN (322235)  
(cghazarian@cooley.com)  
1333 2nd Street, Suite 400  
Santa Monica, California 90401  
Telephone: (310) 883-6400  
MARK WEINSTEIN (193043)  
(mweinstein@cooley.com)  
KATHLEEN HARTNETT (314267)  
(khartnett@cooley.com)  
JUDD LAUTER (290945)  
(jlauter@cooley.com)  
ELIZABETH L. STAMESHKIN (260865)  
(lstameshkin@cooley.com)  
3175 Hanover Street  
Palo Alto, CA 94304-1130  
Telephone: (650) 843-5000  
CLEARY GOTTlieb STEEN & HAMILTON LLP  
ANGELA L. DUNNING (212047)  
(adunning@cgsh.com)  
1841 Page Mill Road, Suite 250  
Palo Alto, CA 94304  
Telephone: (650) 815-4131

*Counsel for Defendant Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,  
Individual and Representative Plaintiffs,  
v.  
META PLATFORMS, INC., a Delaware  
corporation;  
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF KYANA SABANOGLU IN  
SUPPORT OF META'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL PORTIONS  
OF SUPPLEMENTAL JOINT LETTER BRIEF  
AND SUPPORTING EVIDENCE**

I, Kyanna Sabanoglu, hereby declare:

1. I am Associate General Counsel, IP for Defendant, Meta Platforms, Inc. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I make this declaration in support of Meta's administrative motion to file under seal portions of the parties' Supplemental Joint Letter Brief regarding Meta's response to Plaintiffs' Request for Production No. 118 ("Joint Letter Brief") and supporting evidence submitted with the Joint Letter Brief. The motion seeks to have the following partially sealed or entirely sealed:

Document	Sealing Request
Joint Letter Brief	<ul style="list-style-type: none"> <li>Redacted portions</li> </ul>
Exhibit A to Joint Letter Brief	<ul style="list-style-type: none"> <li>Entire document</li> </ul>
Exhibit B to Joint Letter Brief	<ul style="list-style-type: none"> <li>Entire document</li> </ul>
Exhibit C to Joint Letter Brief	<ul style="list-style-type: none"> <li>Redacted portions</li> </ul>

3. Exhibits A and B to the Joint Letter Brief are excerpts of the transcripts of the depositions of Meta employees, which have been marked "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the Stipulated Protective Order. These excerpts include discussion of Meta's highly sensitive internal practices and processes relating to the development of its Llama models, including, in particular the training of the models.

4. The redacted portions of the Joint Letter Brief refer to and describe the deposition testimony in Exhibits A and B as well as further discussion of Meta's highly confidential internal processes relating to the training of its Llama models gleaned from documents produced by Meta and/or deposition testimony from Meta employees designated "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the Stipulated Protective Order.

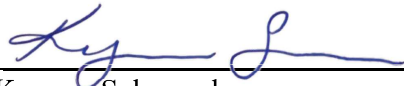
5. The redacted portions of Exhibit C to the Joint Letter Brief discuss confidential information concerning Meta's use of certain datasets to train the Llama models.

6. Public disclosure of the information contained in the redacted portions of the Joint Letter Brief and the corresponding exhibits exposes Meta to the risk of competitive harm by

1 revealing Meta's non-public internal practices and processes, technical details, and trade secret  
2 information pertaining to its generative AI offerings. For this reason, Meta takes steps to carefully  
3 protect the confidentiality of this sort of information.

4 I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct.

6 Executed in New York, New York on this 23<sup>rd</sup> day of December, 2024.

7  
8   
9 Kyanna Sabanoglu